

**Before the
Federal Communications Commission
Washington, DC 20054**

In the Matter of)	
)	WC Docket No. 02-313
Biennial Review 2002)	WT Docket No. 02-310

**COMMENTS OF
THE TEXAS COALITION OF CITIES FOR UTILITY ISSUES**

The Texas Coalition of Cities for Utility Issues ("TCCFUI") is a coalition of approximately 110 Texas cities dedicated to protecting and supporting the interests of the citizens and cities of Texas. TCCFUI is interested in the activities of the Texas Legislature, Public Utility Commission, Railroad Commission and the Federal Communications Commission. TCCFUI also provides franchising expertise to member cities and ensures that the citizens of Texas continue to enjoy quality utility and cable service.¹

Texas Coalition of Cities for Utility Issues is aware that certain commenters have asserted that retention of records and accounting standards for telecommunications providers should be relaxed because they have "outlived their usefulness." TCCFUI respectfully requests that the Federal Communications Commission reject any request to allow the destruction of documents, reduction of retention periods, or the relaxation of accounting standards that are needed for public accountability from telecommunications companies. Given the current climate of public distrust toward corporations, any actions by the Commission to allow destruction of records, to reduce retention periods or to

relax accounting standards for such corporations will further damage the telecommunications industry in the eyes of the public and shareholders. Certainly, such actions would damage the accountability of such companies and call into question the ability and willingness of the Federal Communications Commission to carry out its responsibilities.

Date: November 6, 2002

Respectfully submitted,

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¹ The members of TCCFUI include the following Texas cities: Abernathy, Addison, Alamo, Allen, Andrews, Arlington, Balcones Heights, Belton, Big Spring, Bowie, Breckenridge, Brenham, Brookside Village, Brownfield, Brownwood, Buffalo, Burkburnett, Canyon, Carrollton, Cedar Hill, Center, Cisco, Clear Lake Shores, Cleburne, College Station, Conroe, Corpus Christi, Cottonwood Shores, Crockett, Dallas, Denison, Denton, Dickinson, El Lago, Electra, Fairview, Flower Mound, Fort Worth, Fredericksburg, Friendswood, Georgetown, Grand Prairie, Grapevine, Greenville, Gregory, Groves, Harlingen, Henrietta, Hewitt, Huntsville, Irving, Jacinto City, Jamaica Beach, Kilgore, LaGrange, La Joya, Lampasas, Lancaster, Laredo, League City, Levelland, Lewisville, Longview, Los Fresnos, McAllen, Mexia, Midlothian, Missouri City, Navasota, Nolanville, North Richland Hills, Palacios, Pampa, Paris, Pearsall, Plainview, Plano, Port Neches, Ralls, Refugio, Reno, Richardson, River Oaks, Rosenberg, San Marcos, San Saba, Selma, Seminole, Seymour, Smithville, Snyder, South Padre Island, Spearman, Stephenville, Sugar Land, Sunset Valley, Taylor Lake Village, Terrell, The Colony, Thompsons, Timpson, Town of Westlake, Trophy Club, Tyler, University Park, Victoria, Waxahachie, and Webster.